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Before the
Federal Communications Commission
Washington, DC 20554

MAR 26 1992

Federal Communications Commission
Office of the Secretary

In re Application of)

CONCORD-CARLISLE REGIONAL SCHOOL)
DISTRICT)

File No. BPED-860424MC

For Authorization to Modify)
the Facilities of Noncommercial)
Educational FM Broadcast Station)
WIQH, Concord, MA)

To: Chief, FM Branch
Mass Media Bureau

COMMENTS OF EMERSON COLLEGE

Emerson College, the licensee of noncommercial educational FM
broadcast station WERS, Boston, Massachusetts ("Emerson" or
"WERS"), by its attorneys, hereby submits its comments on the
pending application of Concord Carlisle Regional School District

Emerson is lodging the same objection to the currently pending application. However, because WERS operates on a third adjacent frequency to that of WIQH, and because the potential area of overlap is relatively small, objectionable interference to the receipt of the signal of WERS may not in fact occur. Accordingly, Emerson is willing to accede to the grant of WIQH's application if certain conditions are agreed to by WIQH. WERS believes the conditions are reasonable under the circumstances and will not cause undue expense or inconvenience to WIQH.

Basically, WERS would like WIQH's assurance that WIQH will take certain steps towards attempting to satisfy any complaints within the interference radius for those parties whose reception of WERS is degraded or thwarted by the increased WIQH signal.¹ The interference radius is identified in Exhibit 9, under the heading "Third-Adjacent Channel," and Exhibit ENG-1 of the WIQH application.

Specifically, WERS would like WIQH's assurance that it will take the following steps to insure that its improved facilities do not unduly harm WERS:

- 1) WIQH will cooperate with all listeners who complain that their reception of WERS's signal is being degraded by WIQH's increased facilities. During the first year following the commencement of program test authority,

¹ WIQH is obligated by Section 73.318(b) of the Commission's rules to resolve complaints of interference within one year from the commencement of program test authority within the blanketing area. WERS is seeking WIQH's pro-active involvement in resolving complaints of interference in the larger interference radius.

WIQH will resolve complaints of interference at its own expense. Thereafter, WIQH will lend advice and assistance to complainants but will not be obligated to

If WIQH were amenable to these measures, WERS would formally remove any objection to the grant of WIQH's application.

Respectfully submitted,

EMERSON COLLEGE

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It Attorneys

March 26, 1992

CERTIFICATE OF SERVICE

I, Gerald Stevens-Kittner, an attorney with the law firm of Arter & Hadden, hereby certify that on this 26th day of March, 1992, the foregoing "Comments of Emerson College" have been served . by First Class U.S. Mail, postage prepaid upon the following

Mr. Ned Ross
WIQH(FM)
500 Walden Street
Concord, Massachusetts 01742
